

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

MARION MISIAK and  
MARY BETH MISIAK,

Plaintiffs,

v.

No. 07 CV 6330

MORRIS MATERIAL HANDLING, INC., a  
foreign corporation, d/b/a P&H Cranes, P&H  
CRANES, individually and as a division of Morris  
Material Handling, Inc., WHITING  
CORPORATION, a foreign corporation,  
HUBBELL INCORPORATED, a foreign  
corporation, d/b/a/ Gleason Reel Corp., and  
GLEASON REEL CORP., a foreign corporation,  
a/k/a GRC International, individually and as a  
division of Hubbell Incorporated,

Defendants.

**NOTICE OF MOTION**

To: *Via ECF Filing*  
All parties of record  
(See attached service list)

PLEASE TAKE NOTICE that on August 5, 2008, at 9:00 a.m. or as soon thereafter as counsel may be heard, we will appear before the Honorable Nan Nolan, or any judge sitting in her stead in the courtroom usually occupied by her, Courtroom 1858, located at the Dirksen Federal Building, Chicago, Illinois, and present **Hubbell/Gleason's Agreed Motion for Protective Order** in the above matter, a copy of which is attached.

/s/ Peter J. Gillespie  
BAKER & MCKENZIE LLP

BAKER & MCKENZIE LLP  
Mark L. Karasik #6180292  
Peter J. Gillespie #6272978  
130 East Randolph Drive  
Chicago, Illinois 60601  
(312) 861-8000

STATE OF ILLINOIS )  
COUNTY OF COOK ) SS.  
 )

**PROOF OF SERVICE**

The undersigned, being first duly sworn upon oath, deposes and states that a copy of this Notice of Filing and attached pleading(s) have been served upon the attorneys of record via electronic filing this 31<sup>st</sup> day of July 2008. A copy has been sent via Email to Timothy V. Hoffman at Thoffman@sanchezDH.com.

/s/ Heather L. LaSusa

Under penalties of perjury as provided by law, I certify that I served the foregoing pleading as set forth above.

**MISIAK V. HUBBELL**  
**22100783-000036**

**SERVICE LIST**

Attorneys for Plaintiffs Marion and Mary Beth Misiak:

Antonio M. Romanucci  
Stephan D. Blandin  
Romanucci & Blandin, LLC  
33 N. LaSalle St.  
Suite 2000  
Chicago, IL 60602  
Phone: 312-458-1000  
[kjj@rblaw.net](mailto:kjj@rblaw.net)  
[sdb@rblaw.net](mailto:sdb@rblaw.net)

Attorneys for Whiting Corporation:

Timothy M. Palumbo  
Kopka, Pinkus & Dolin, P.C.  
200 N. LaSalle St.  
Suite 2850  
Chicago, IL 60601-1014  
312-782-9920  
[tmpalumbo@kopkalaw.com](mailto:tmpalumbo@kopkalaw.com)

Attorneys for Morris Material Handling, Inc.:

Thomas J. Andrews  
Johnson & Bell, Ltd.  
33 W. Monroe Street  
Suite 2700  
Chicago, IL 60603  
Phone: 312-372-0770  
[andrewst@jbltd.com](mailto:andrewst@jbltd.com)